

THE HARMAN FIRM, LLP

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February 12, 2016

VIA ECF and FACSIMILE [718-613-2365]

Honorable Cheryl L. Pollak
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

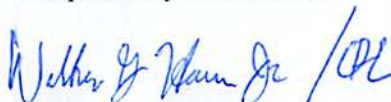
Re: Fernandez v. Woodhull Medical and Mental Health Center, et al.;
Case No. 14 Civ. 4191 (MKB) (CLP)

Dear Judge Pollak:

This firm represents the Plaintiff in the above-referenced action. We jointly write with counsel for Defendants, pursuant to Your Honor's instruction in the conference held on February 8, 2016, and the Court's Order of that same day (Docket No. 38). The parties have set the following dates for depositions: Defendants will take Plaintiff's deposition on March 22, 2016. Plaintiff will take Vincent Mulvihill's deposition on March 23, 2016, and Maire Kavanagh's deposition on March 24, 2016. Plaintiff served a subpoena on Matrid Harper and awaits a response. Plaintiff anticipates taking Ms. Harper's deposition on March 25, 2016. Defendants have not yet designated specific individuals in response to Plaintiff's 30(b)(6) deposition; Plaintiff intends to depose those individuals during the week of March 29, 2016. The parties will keep the Court abreast of developments.

Thank you for your time and attention to this matter.

Respectfully submitted,



Walker G. Harman, Jr.

cc: Donna A. Canfield, Esq. [Via ECF]